



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

100 CHURCH STREET  
NEW YORK, NY 10007

**MARK D. ZUCKERMAN**  
Senior Counsel  
E-mail: mzuckerm@law.nyc.gov  
Phone: (212) 356-3519  
Fax: (212) 788-9776

March 5, 2024

**VIA ECF**

The Honorable Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Paul Phillips, et. al. v. The City of New York, et. al., 21 Civ. 8149  
(ALC)(SLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing the appearing defendants in the above referenced matter. The City respectfully requests until March 7, 2024 to address the issues set forth in plaintiffs' renewed motion to serve the defendant Renan Beauchard by email at Docket 157. Plaintiffs' submission is replete with material misrepresentations and omissions. As such, the City wishes to address the issues contained in plaintiffs' renewed motion so that the Court has as much, as well as the correct, information in reaching its decision.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman

cc: All counsel (via ECF)